Alternative Development

How Alternatives Are Identified

An alternative is a combination of proposed land use allocations, activities, resource uses, and management practices designed to meet the stated purpose and need for the plan revisions (see above).

The National Environmental Policy Act requires an agency to rigorously explore and objectively evaluate all reasonable alternatives. A reasonable alternative is one that:

- Meets the purpose and need.
- Is feasible and practicable.
- Is not exorbitant.
- Is not a variation of an alternative analyzed in detail.

Each alternative represents a separate set of objectives, land use allocations, and management actions that address and resolve the purpose and need in a different way. In developing the array of alternatives for the Western Oregon Plan Revisions, four broad strategies were identified. These strategies are based on BLM's experience implementing the current plans; results of the Conference on Science and the Northwest Forest Plan: Knowledge Gained over a Decade; and information received during public scoping. Developing at least one alternative for each strategy will meet the Council of Environmental requirements for a reasonable range of alternatives. The four strategies are described below.

Four Strategies for Developing Alternatives for the Western Oregon Plan Revisions

- *Strategy 1* - Maintain land use allocations in their present configuration with relatively minor changes in management direction. This would be the required No Action Alternative.
- *Strategy 2* - Maintain land use allocations in their present configuration with the exception of riparian reserves. Examine an alternative aquatic strategy. Revise standards and guidelines for other land use allocations based on lessons learned. (Northwest Forest Plan with some changes).
- *Strategy 3* - A new management strategy with different land use allocations and different management direction.
- *Strategy 4* - A new management strategy that minimizes the partition of land into land use allocations. Situational management direction based on desired conditions at broad landscape scales.

These four strategies were used to develop possible action alternatives for development and detailed analysis, as described in following text.

Objectives and management direction will be written in specific, measurable, and trackable terms as appropriate for each alternative. Additional variation within an alternative will be evaluated using sub-alternatives or sensitivity analysis.

Sub-alternatives analyze the effects of adding or removing an element of an alternative to analyze the impacts of that action without developing an entirely new alternative. An example would be to eliminate all regeneration harvest from one or more alternatives.

Sensitivity analysis varies a constant element of an alternative and identifies opportunities and costs associated with each degree of application. An example would be to vary the width of riparian areas within one or more alternatives.

Consideration of Issues in Alternative Development

As alternatives are developed, the following preliminary issues will be addressed:

- *Vegetation* - How should BLM provide a sustainable supply of wood and other forest products as mandated by the O&C Lands Act while meeting applicable laws and regulations?
- *Habitat for Special Status Species* - How can BLM-managed lands contribute to conservation of species consistent with the Endangered Species Act?
- *Watershed Management and Water Quality* – How can BLM-managed lands contribute to meeting the goals of the Clean Water Act and the Safe Drinking Water Act?
- *Wildland Fire and Fuels* - How should BLM manage public lands to reduce the risk of wildfires and integrate fire back into the ecosystem?

These four preliminary issues were validated through public scoping.

Guidance for Development of All Action Alternatives

The following actions will be included in all action alternatives:

- Reduce or eliminate process and mid-level analysis requirements (such as upper level reviews, watershed analysis, and late-successional reserve assessments).

- Clearly define adaptive management processes.

- Working closely with the Oregon State Department of Environmental Quality, satisfy state requirements of Water Quality Management Plans at the resource management plan level.

- Satisfy the Clean Air Act requirements.

- Working closely with Federal regulatory agencies, provide sufficient detail in the analysis to reduce the need for project-level Endangered Species Act consultation and provide for recovery or conservation of species listed under the Endangered Species Act.

- Provide a framework to facilitate subsequent cumulative effects and reduce the need for project-level NEPA analysis.

- Review existing Special Recreation Management Areas (SRMAs) and Extensive Recreation Management Areas (ERMAs) and do the following:
  - Adjust boundaries of SRMAs to incorporate acquired lands, consolidate areas, consider resource values, etc.
  - Revise management direction where need is identified.
  - Eliminate SRMA designations for areas that no longer meet the criteria for inclusion, or are inconsistent with goals and objectives of the alternatives.
  - Add additional potential recreation sites, trails, and other facilities to the list of possible SRMAs for future development.
  - Eliminate those potential recreation sites, trails, and other facilities that are no longer needed from the list of possible SRMAs for future development.

- Review nominations for new Areas of Critical Environmental Concern, as well as existing Areas of Critical Environmental Concern, and do the following:
  - Determine if they meet the Relevance and Importance criteria.
  - For those on O&C lands that meet Relevance and Importance criteria, determine if designation would be a conflict with the O&C Act.

  - Eliminate from further consideration those areas that do not meet criteria for designation as Areas of Critical Environmental Concern.
  - Determine if management of the remaining nominations can be accommodated within the alternatives.
  - In development of alternatives, include those nominations that meet criteria for designation as Areas of Critical Environmental Concern.

- Designate areas in Visual Resource Management classifications consistent with alternatives, and incorporate new national policy on Wilderness Study Areas.

- Designate areas as "open," "limited," or "closed" to off-highway vehicle use.

- Designate special cultural resources that may affect the location, timing, development, or use of other resources.

- Designate areas that are available and have the capacity for planned, sustained-yield timber harvest or special forest product harvest.

- Designate lands that are available or not available for livestock grazing.

- Designate lands for retention or disposal.

- Designate lands as "open" or "closed" to the several forms of mineral entry location, leasing, or sale as is appropriate to the type of commodity and land status.

Possible Action Alternatives for Development and Detailed Analysis

The preliminary alternatives listed below include proposals that were identified during public scoping. These alternatives may be altered or refined based on public comments, or refinements made during development of objectives and management action/ direction.

Each possible action alternative described below is based on one of the four strategies for developing alternatives discussed earlier in this chapter.

No Action Alternative (Represents Strategy 1)

- The No Action Alternative will be analyzed as written in the existing resource management plans.

Revised Northwest Forest Plan with Particular Focus on a Different Riparian Reserve (Based on Strategy 2)

- Retain current land use allocations except riparian reserves.
- Retain Aquatic Conservation Strategy Objectives; however, develop different strategies to attain the objectives.
- Incorporate sources for large wood contribution to streams in the riparian reserves.
- Remove terrestrial objectives from riparian reserves.
- Emphasize density management in reserves.
- Remove minimum age requirements for applying harvest treatments.
- Allow for density management of stands in reserves past 80 years of age.
- Re-examine need for connectivity/diversity blocks.
- Re-examine need for or location of key watersheds.
- Re-examine need for adaptive management areas.
- Acknowledge that natural disturbance may set stand age to 0.

Sub-alternatives

- Thin only. No regeneration harvest.
- Allow regeneration harvest of older stand *only* when thinning of younger stand will no longer support the Allowable Sale Quantity.

Sensitivity Analysis

- Reserve stands at ages greater than 80, 120, and 200 years of age.
- Test various riparian reserve widths.

Traditional Static Reserve Land Allocation Management with Land Use Allocations Based on Meeting Legal Requirements (Based on Strategy 3)

- Establish land use allocations *only* to meet legal requirements.
- Establish land use allocation based on maintaining sufficient suitable habitat within critical habitat for listed species.
- Establish reserves to avoid jeopardy and meet Clean Water Act, which for State and private lands is the Oregon Forest Practices Act.
- Practice traditional intensive forest management to produce high timber yields in lands not removed from harvest land base.
- Acknowledge that natural disturbance may set stand age to 0.

Sub-alternatives

- Thin only. No regeneration harvest.
- Allow regeneration harvest of older stand *only* when thinning of younger stand will no longer support the Allowable Sale Quantity.

Sensitivity Analysis

- Reserve stands at ages greater than 80, 120, and 200 years of age.
- Test various riparian reserve widths.

Minimize Land Use Allocations and Manage Under Extended Rotation (Based on Strategy 4)

- Minimize partitioning by land use allocations (except for Congressional designations or special areas established for threatened or endangered species).
- Manage entire land base for timber production (with the above exceptions) under a long rotation (such as 300 years).
- Manage young stands for timber production in the near term, including intermediate harvest to improve stand structure, or regeneration harvest in younger stands.
- Provide a density management harvest to provide for complex stand structure.
- Maintain habitat until the desired age class distribution is achieved.
- Conduct active management across all lands (with above exceptions).
- Have one rule set for the entire land base.

Sensitivity Analysis

- Test impact of various rotation ages on desired conditions.

Situational Management Under Constant Change Theory (Based on Strategy 4)

- Minimize partitioning by land use allocations (except for Congressional designations or special areas established for threatened or endangered species).
- Vary management direction by watershed or an aggregation of similar watersheds.
- Base the management direction on percentage of BLM ownership, importance of streams, presence of critical habitat, and special status species "hot spots," etc.
- Incorporate structural-based management concepts.
- Use situational management, which would vary with changing circumstances.
- Overlay landscape with wildland urban interface in a manner similar to key watersheds to help focus management in those areas.

- Avoid management that would cause catastrophic disturbance in the O&C checkerboard.

Sensitivity Analysis

- Test various combinations of stand structure on achieving desired conditions.

Budget Considerations

Over the last few years, BLM's labor costs have been increasing while funding has essentially been flat. By 2010, a 30 percent decline is expected in the purchasing power of the budget due to inflationary effects combined with flat or declining budgets. The alternatives will have some costs associated with them that will vary, depending on three factors:

1. *Complexity of the NEPA and consultation required to implement the alternative*. For example, an alternative that clearly defines and constrains management actions over a limited landscape would be less complex to analyze and plan than alternatives that allow for a wide variety of management actions across the general landscape.

2. *Complexity of preparing the projects and the level of expertise required of employees preparing the projects*. For example, because they tend to cover larger areas of land than regeneration harvests, thinning sales require more time and personnel to prepare than regeneration harvest. However, the cruising skill level and local knowledge required in thinning sales are less than those needed to cruise old-growth timber. In addition, thinning requires only a minimum investment in forest development costs or nursery maintenance compared to the site preparation, seedling costs, and protection costs of reforestation following regeneration harvest.

3. *Controversy with management actions associated with the alternatives*. A regime of thinning in upland areas is less likely to generate challenges in the form of protests and appeals or litigation compared to regeneration harvest or implementing projects in riparian areas. Therefore, thinning requires less time to conduct NEPA analysis, complete consultation under the Endangered Species Act, and respond to protests or litigation.

Alternatives will not be constrained by anticipated budget levels. Comparison between alternatives will be accomplished by comparison to current budget levels.

The analysis in the Environmental Impact Statement will consider the following factors:

- Cost in effort and/or dollars required to implement the plan.
- Revenue generated to the U.S. Treasury and counties.

Research

Ongoing research projects will be protected, to the extent possible, under all alternatives. When existing research actions are not consistent with alternative prescriptions or land use allocations, the projects will be analyzed for continued relevancy, and if found necessary, temporary allocations or deferrals may be allocated to allow for research completion. New research proposals considered necessary to test planning and modeling assumptions and provide data for plan monitoring will be identified during alternative development and creation of the monitoring plan. Research proposals not directly related to plan monitoring and testing will be analyzed for conformity with the O&C Act, as implemented in the land use allocations and prescriptions for each alternative.